

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 10/25/2022

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October 24, 2022

Via ECF

Honorable Vernon S. Broderick
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: CONSENT APPLICATION
Federal Insurance Co. v S.E.I. Sun Express
International Ltd. et al.
Case No. 22 Civ. 07191 (VSB)(SN)

Dear Judge Broderick:

I represent Plaintiff Federal Insurance Co. in this Montreal Convention cargo action. With the consent of counsel for Defendants Cargolux International Airways Ltd. ("Cargolux") and Sun Express Int'l, Inc. ("Sun Express") I write to inform the Court of the status of the action.

Said parties are now working to finalize a proposed settlement and are in the process of drafting a closing document. The settlement figure, and contribution amounts, have been agreed on, but other terms are being ironed out. With this in mind, I respectfully request that Your Honor allow 21 days for Plaintiff, Cargolux and Sun Express to finalize these efforts. I will undertake to submit a letter updated status report to the Court no later than November 11, 2022. In the interest of judicial and party economy, I also request that the Court adjourn for the same period the October 25, 2022 deadline for Plaintiff to file for a default judgment as to Defendant S.E.I Sun Express International Ltd. and that the entry of the Clerk's Certificate of Default also be deferred during that period. This application does not affect any deadline in this action other than that which is mentioned herein. There has been no prior request to extend the October 25, 2022 default judgment application deadline.

I remain at Your Honor's disposal if additional information is required to address this consent application.

Respectfully submitted,

s/David L. Mazaroli

David L. Mazaroli

cc: All counsel of record (via fax and ECF)